

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

DIVISION

2006 APR 26 A 11: 52

DEBRA P. HACKETT, CLERK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA.

Elaine M. Coley

Plaintiff

Alabama Medicaid
Agency

Defendant(s)

2:06CV378-WKW

COMPLAINT

1. Plaintiff resides at 6321 Sandy Ridge Curve
Montgomery, AL 36117

2. Defendant(s)' name(s) Alabama Medicaid Agency

Location of principal office(s) of the named defendant(s) 501 Dexter Avenue, Montgomery, AL 36103

Nature of defendant(s)' business State Medicaid agency

Approximate number of individuals employed by defendant(s) 500+

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 2000e-5(g).

4. The acts complained of in this suit concern:

1. ☐ Failure to employ me.
2. ☐ Termination of my employment.
3. ☐ Failure to promote me.
4. ☒ Other acts as specified below: discrimination in

performance appraisals costing plaintiff promotional advancement opportunities. Defendant placed negative information in my personnel file as well.

SCANNED

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5. Plaintiff is:

- A. ☐ Presently employed by the defendant.
☒ Not presently employed by the defendant. The dates of employment were March 2000 - January 2005. Employment was terminated because:

- (1) ☐ Plaintiff was discharged.
 (2) ☐ Plaintiff was laid off.
 (3) ☒ Plaintiff left job voluntarily.

6. Defendant(s)' conduct is discriminatory with respect to the following:

- A. ☒ My race.
 B. ☐ My religion.
 C. ☐ My sex.
 D. ☐ My national origin.
 E. ☒ Other, as specified below: Retaliation because of

complaints made to human resources regarding
harassment and disparate treatment.

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company

is (are) Robin Rawls, Carol Herman, Lee Maddox and
Mike Murphy.

8. The alleged discrimination occurred on or about March 2003 until January 24, 2005.

9. The nature of my complaint, i.e., the manner in which the individual(s) named above discriminated against me in terms of the conditions of my employment, is as follows: _____

Please see attached.

10. The alleged illegal activity took place at my place of employment
501 Dexter Avenue, Montgomery, AL.

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s)' alleged discriminatory conduct on or about 12/21/2004. I have attached a copy of the Notice-of-Right-to-Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on 1/28/06.

12. I seek the following relief:

- A. ☒ Recovery of back pay.
B. ☐ Reinstatement to my former job,
and any other relief as may be appropriate, including injunctive orders, damages, costs, and attorney's fees.

✓
Date:

4-26-06

Galani M. Colby

Signature of Plaintiff

6321 Sandy Ridge Curve
Montgomery, AL 36117

207-3606
Address & Telephone Number of Plaintiff